

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
FAYETTE COUNTY, TENNESSEE;)
and THE FAYETTE COUNTY BOARD)
OF COMMISSIONERS,)
)
)
Defendants.)

No. 2:25-cv-02047-MSN-cgc

**DEFENDANTS' SECOND MOTION FOR EXTENSION OF TIME TO
FILE RESPONSIVE PLEADING**

Defendants, Fayette County, Tennessee and an entity known as “Fayette County Board of Commissioners”, by and through undersigned counsel and without waiving any and all defenses available, hereby moves the Court for an additional extension of time to file a response to the Plaintiff’s Complaint. In support thereof, Defendants state and show as follows:

1. The Court previous entered an Order (DN 16 entered 2/20/25) which granted the Defendant until March 28, 2025 to file a responsive pleading to the Complaint.
2. The Defendants continue to investigate the allegations of the Complaint and the numerous factual allegations and conclusions of law. Based on these continuing efforts and unexpected time restraints of Counsel for the Defendant, the Defendant must respectfully request an additional extension until April 7, 2025, to serve a responsive pleading. It is the belief of counsel for Defendants that no prejudice will result to the Plaintiff because of this extension.

3. In support of this motion, Defendants rely upon the Consultation of Counsel and shows to the Court that counsel for Plaintiff does not object to the present motion. Thus, counsel for the Defendants request an extension be granted until April 7, 2025 to serve a responsive pleading.

Respectfully submitted,

PENTECOST, GLENN & TILLY, PLLC

By: s/James I. Pentecost
James I. Pentecost (#11640)
Attorneys for Defendants
162 Murray Guard Drive, Suite B
Jackson, Tennessee 38305
(731) 668-5995 – Telephone
(731) 668-7163 – Facsimile
jpentecost@pgtfirm.com

CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), the undersigned certifies that defense counsel contacted Plaintiff's counsel via e-mail, regarding the relief sought in this motion. Plaintiff's counsel or representative informed that Plaintiff has no objection to this Second Motion for Extension of Time to File Responsive Pleading.

By: s/James I. Pentecost
James I. Pentecost

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document (Motion for Extension) was served via US District Court ECF system upon:

Sarah Pazar Williams
Assistant United States Attorney
United States Attorney's Office
167 North Main Street, Ste. 800
Memphis, TN 38103

Tharuni A. Jayaraman
Jacki L. Anderson
950 Pennsylvania Avenue NW
Washington, DC 20530

on or before the filing date thereof.

DATE: This the 25th day of March, 2025.

By: s/James I. Pentecost
James I. Pentecost